

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND

ERIC WILLIAMS  
T/U/O Mayor & City Council  
of Baltimore City

Plaintiff

-vs-

H. D. INDUSTRIES, INC.

Defendant

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CIVIL ACTION #WMN-02-2147

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**PLAINTIFF S MOTION TO COMPEL**

Now comes the Plaintiff, Eric Williams, by and through his attorney, Mark E. Herman, and moves this Honorable Court, pursuant to Federal Rules, to compel the Defendant, H. D. Industries, Inc., to provide discovery responses, and in support thereof, states as follows:

1.1. On or about December 2, 2002, counsel for Plaintiff served Interrogatories and Request for Production of Documents on counsel for the Defendant. Plaintiff's counsel has attached hereto and prayed to be incorporated as Plaintiff's Exhibit A.

2. The time within which to answer the discovery has long expired.

3.3. Plaintiff's counsel has, on many occasions, requested the discovery, but without success.

4. On March 12, 2003, Plaintiff's attorney wrote to Defendant's attorney requesting a copy of said letter is attached hereto as Exhibit B.

5.5. As of this date, Defendant has failed to provide Answers to Interrogatories.

to Request for Production of Documents.

WHEREFORE, WHEREFORE, for the foregoing reasons, Plaintiff Eric W WHEREFORE, for the foregoing reasons, Plaintiff Eric W  
Court Court to Compel the Defendant to answer the Interrogatories and Request for Court to Compel the Defendant to answer the Interrogatories and Request for  
Documents served on the Defendant on December 2, 2002.

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MARK E. HERMAN  
Attorney for Plaintiff  
14 W. Madison Street  
Baltimore, Maryland 21201  
(410) 837-2144

**CERTIFICATE OF GOOD FAITH EFFORTS**

I HEREBY CERTIFY I HEREBY CERTIFY that I sent letters dated March 12, 2003 and I HEREBY CERTIFY that I sent letters dated March 12, 2003 and  
Robert Bouse, Jr., on March 7, 2003 at 3:30 P.M., in an attempt to contact Robert Bouse, Jr., on March 7, 2003 at 3:30 P.M., in an attempt  
was unsuccessful in my efforts.

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MARK E. HERMAN

**CERTIFICATE OF SERVICE**

II HEREBY CERTIFY that onl HEREBY CERTIFY that on this 2nd day of May, 2003, a copy of this Mo  
andand proposed Order was mailed, postageand proposed Order was mailed, postage prepaid, to Robert H. Bous  
King,King, LLP, 201 N. Charles Street, Suite 2000, Baltimore, Maryland 21201, attorney forKing, LLP, 201 N. Cl

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MARK E. HERMAN  
Attorney for Plaintiff  
14 W. Madison Street  
Baltimore, Maryland 21201  
(410) 837-2144

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**ORDER GRANTING PLAINTIFF S MOTION TO COMPEL**

UPON considerationUPON consideration of Plaintiff s Motion to Compel, and any opposition thereto, it  
\_\_\_\_\_ day of \_\_\_\_\_, 2003, by the United States District Co \_\_\_\_\_ day of \_\_\_\_\_  
Maryland;

ORDERED that Plaintiff s Motion to Compel is hereby GRANTED; and it is further

ORDEREDORDERED that the DefendantORDERED that the Defendant shall have \_\_\_\_\_ days from the  
AnswersAnswers to Interrogatories Answers to Interrogatories and Answers to Interrogatories and Responses to  
counsel.

\_\_\_\_\_  
JUDGE